

November 5, 2020

California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Low Carbon Fuel Standard – Potential Regulation Revisions.

California Air Resources Board:

On behalf of the California Transit Association, I write to you today to provide comment on the potential regulation revisions, impacting the Low Carbon Fuel Standards (LCFS), discussed at the public workshop on October 14. As you know, transit agencies statewide rely on LCFS proceeds to support their transition to zero-emission technologies and to offset the cost of electricity as a fuel.

We understand from the workshop presentation that ARB is considering regulation revisions to clarify the spending requirements on, and appropriate uses of, LCFS proceeds. We appreciate that, as currently contemplated, these revisions would not impact the spending requirements placed on transit agencies or their use of LCFS proceeds. Continued flexibility for transit agencies in the use of LCFS proceeds is vital, especially now as transit agencies seek to advance aggressive electrification plans, consistent with the Governor's Executive Order N-79-20, while also managing the adverse impacts the COVID-19 pandemic has had on operating budgets.

As potential revisions to the LCFS Regulation are developed over the coming months, we urge you maintain the flexibility for transit agencies in place today and consistent with staff intent.

Thank you for the opportunity to provide comments on the potential amendments to the LCFS regulation.

Sincerely,

A handwritten signature in black ink, appearing to read 'Michael Pimentel', written in a cursive style.

Michael Pimentel
Deputy Executive Director